

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA)	
)	
v.)	No. 14 CR 319-2
)	Judge John W. Darrah
KE GU)	

UNOPPOSED MOTION TO EXTEND TIME TO FILE PRETRIAL MOTIONS

Defendant Ke Gu, through his counsel, Francis C. Lipuma, herein moves this Honorable Court to allow an extension of time in which to file his pretrial motions. In support thereof, Mr. Gu states as follows:

1. On June 3, 2014, Mr. Gu was charged in a three-count indictment alleging violations of 17 U.S.C. § 506(a)(1)(A) and 18 U.S.C. §§ 1341 and 2319. (Doc. 1).

2. On June 11, 2014, Magistrate Judge Maria Valdez conducted an arraignment and initial appearance at which time Mr. Gu entered a plea of not guilty. Additionally, Magistrate Judge Valdez announced the following schedule: Rule 16.1(a) conference by June 18, 2014, pretrial motions by June 25, 2014, responses by July 2, 2014, and a status hearing before Judge John W. Darrah on July 9, 2014. (Doc. 10).

3. On June 19, 2014, Judge Darrah entered an order continuing the status hearing to August 14, 2014. (Doc. 14).

4. It is respectfully submitted that Mr. Gu is unable to file pretrial motions by June 25, 2014. The government has indicated that it is in the process of having discovery scanned onto CDs to be followed by production to the defense in short order. Once the defense receives the discovery, the materials need to be reviewed and the evidence needs to be studied. A defense investigation has begun, but such investigation will be broadened upon learning of the government's evidence. Mr.

Gu submits that he should be given an opportunity to conduct an investigation as well as review and evaluate all of the discovery prior to the filing of pretrial motions.

5. This motion is not brought for the purpose of delaying the proceedings in this case, but rather is brought in order for counsel to competently represent Mr. Gu, to allow Mr. Gu to make informed decisions regarding the pretrial proceedings, and to protect and preserve Mr. Gu's statutory and constitutional rights.

6. Mr. Gu understands his Speedy Trial Act rights, and neither he nor his counsel have an objection to the continued exclusion of time under the Speedy Trial Act through the date of the August 14, 2014 status hearing.

7. Assistant U.S. Attorney Peter Salib has been informed about the substance of, and relief requested in this motion, and he has indicated the government does not oppose this motion.

Wherefore, defendant Ke Gu respectfully requests this Honorable Court to grant this motion and allow him to file any pretrial motions by a date to be determined at the status hearing.

Respectfully submitted,

s/ Francis C. Lipuma
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Attorney for Ke Gu

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CERTIFICATE OF SERVICE

I, Francis C. Lipuma, an attorney, do hereby certify that I caused a copy of “Unopposed Motion To Extend Time To File Pretrial Motions” to be served upon:

Peter Salib
U.S. Attorney’s Office
219 South Dearborn Street
Chicago, IL 60604

pursuant to Fed.R.Crim.P. 49, Fed.R.Civ.P. 5, L.R. 5.5, and the General Order on Electronic Case Filing of the United States District Court for the Northern District of Illinois, Eastern Division.

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